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19 Attorneys for Plaintiffs

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 SHIGE TAKIGUCHI, et. al,  
23 Individually and On Behalf of All  
24 Others Similarity Situated,

25 Plaintiffs,

26 v.

27 MRI INTERNATIONAL, INC.,  
28 EDWIN J. FUJINAGA, JUNZO  
SUZUKI, PAUL MUSASHI  
SUZUKI, LVT, INC., dba STERLING  
ESCROW, and DOES 1-500,

Defendants.

Case No.: 2:13-cv-01183-HDM-NJK

**STIPULATION AND  
ORDER RE PAYMENT OF  
ATTORNEYS FEES AND COSTS  
INCURRED BY SUZUKI  
ENTERPRISES, INC. PROFIT  
SHARING PLAN DURING  
NOVEMBER 2017**

1           WHEREAS Defendant Suzuki Enterprises, Inc. Profit Sharing Plan (the  
2       "Plan") and Plaintiffs are collectively referred to herein as the "Parties";

3           WHEREAS on December 2, 2016, the Court issued its order [550] ("Order  
4       re Fees") approving the Stipulation re Payment of Attorneys' Fees [549]  
5       ("Stipulation re Fees"), providing a procedure for payment of legal fees and costs  
6       from Plan funds that are presently subject to the preliminary injunction [183]  
7       issued by this Court;

8           WHEREAS the Plan incurred legal fees and costs in November 2017 in the  
9       amount of \$7,109.50, in connection with: coordinating global settlement  
10      discussions, and communications with multiple counsel, Plan fiduciaries and the  
11      Court regarding settlement issues;

12       WHEREAS such fees and costs are payable as follows:

13       • \$6,664.00 payable to Foundation Law Group LLP, lead counsel for  
14          the Plan; and

15       • \$445.50 payable to Enenstein Pham & Glass, local counsel for the  
16          Plan;

17       WHEREAS the invoices for the Plan's legal fees with specific descriptions  
18       of the work accomplished are attached hereto as Exhibit "A";

19       WHEREAS the Parties have communicated a mutual desire to avoid the  
20       necessity of a formal motion for attorneys' fees through this Stipulation;

21       NOW, therefore, the Parties stipulate as follows:

22       1. \$6,664.00 of the funds held by LPL Financial for the benefit of the Plan  
23          shall be unfrozen and released from the preliminary injunction [183] and  
24          paid to Foundation Law Group LLP; and

25       2. \$445.50 of the funds held by LPL Financial for the benefit of the Plan  
26          shall be unfrozen and released from the preliminary injunction [183] and  
27          paid to Enenstein Pham & Glass;

1       3. The remaining funds held by LPL Financial for the benefit of the Plan  
2       shall remain frozen and subject to the preliminary injunction [183]  
3       pending a further application for payment of attorneys' fees and  
4       expenses; and  
5  
6       4. Payment of attorneys' fees and expenses for the month of November  
7       2017 (per items 1-2 above) shall be made from cash on hand that is held  
8       in the name of the Plan.

9       DATED: December 3, 2017

10      DATED: December 3, 2017

11      **MANNING & KASS ELLROD**  
12      **RAMIREZ, TRESTER LLP**

13      By: /s/ James E. Gibbons  
14      *Attorneys for Plaintiffs*

15      **ENENSTEIN PHAM & GLASS**

16      By: /s/ Robert A. Rabbat  
17      *Attorneys for Suzuki Enterprises, Inc.,*  
18      *Profit Sharing Plan*

19      DATED: December 3, 2017

20      DATED: December 3, 2017

21      **LAW OFFICES OF ROBERT W.**  
22      **COHEN, A.P.C.**

23      By: /s/ Robert W. Cohen  
24      *Attorneys for Plaintiffs*

25      **FOUNDATION LAW GROUP LLP**

26      By: /s/ Gregg D. Zucker  
27      *Attorneys for Suzuki Enterprises,*  
28      *Inc., Profit Sharing Plan*

22                   **ORDER**

23      **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24      DATED this 6th day of December, 2017.

25                   

26                   United State District Court Judge